



M O S K O W I T Z & B O O K , L L P

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April 2, 2020

VIA ECF

Hon. Colleen McMahon
Chief United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Jonathan Skolnick
 19 Cr. 720 (DLC)

Dear Judge McMahon:

This letter motion is respectfully submitted on behalf of the defendant, Jonathan Skolnick, inmate #76346-054, who is incarcerated at the MCC pending trial.

As Your Honor is aware, the MCC has suspended all inmate visits as a result of the ongoing pandemic. More recently, most or all units at the MCC have been placed on some form of isolation or quarantine, in an effort to reduce the spread of the virus among inmates. As a result of those restrictions, Mr. Skolnick has effectively been on lockdown for almost a month, with no meaningful ability to communicate with counsel or friends and relatives outside the MCC. Indeed, since the lockdown, I have only had one telephone contact with Mr. Skolnick, and 2-3 emails.

On Wednesday morning, I learned morning that Mr. Skolnick's father had died in England of the coronavirus responsible for the pandemic. When Mr. Skolnick last had contact with the outside world, he was aware that his father had fallen ill, but we understand that he has no knowledge of his father's death. At 7:43 a.m., immediately after learning of the tragic news, I

contacted Nicole McFarland, counsel for the MCC, to attempt to arrange a telephone call with Mr. Skolnick to inform him of his father's death. I also requested that Mr. Skolnick be allowed to speak to his brother Daniel, the sole remaining member of his immediate family, so that they can grieve together, even if only for a few minutes. Unfortunately, I did not receive a response to my request. This morning, I sent a second email to Ms. McFarland, renewing my request for a legal phone call with Mr. Skolnick and for a phone call between Mr. Skolnick and his brother. I also forwarded to Ms. McFarland a copy of the burial certificate for Mr. Skolnick's father, as she requested. Unfortunately, my renewed request has also not received a response.

Accordingly, we respectfully request that the Court enter an Order directing the MCC (1) to set up a telephone call between Mr. Skolnick and his brother Daniel, who is a resident of Israel and who is now Mr. Skolnick's last surviving immediate family member; and (2) to set up a legal call between Mr. Skolnick and his counsel. It is respectfully submitted that even under these difficult conditions and in this difficult time period, Mr. Skolnick and his brother deserve an opportunity to mourn their father together, even if only briefly and by telephone.

Thank you for your consideration of this request.

Respectfully submitted,

By: /s/
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